

AB:ADG

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 21, U.S.C., §§ 952(a), 960(a)(1) and  
960(b)(2))

TERRENCE HOHENKIRK,

No. 18-M-624 (RER)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

RENEE TUINSTRA, being duly sworn, deposes and states that she is a  
Special Agent with the United States Department of Homeland Security, Immigration and  
Customs Enforcement, Homeland Security Investigations ("HSI").

Upon information and belief, on or about July 3, 2018, within the Eastern  
District of New York and elsewhere, the defendant TERRENCE HOHENKIRK did  
knowingly and intentionally import controlled substances into the United States from a place  
outside thereof, which offense involved substances containing cocaine, a Schedule II  
controlled substance.

(Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(2))

The source of your deponent's information and the grounds for her belief are  
as follows:<sup>1</sup>

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<sup>1</sup> Because the purpose of this complaint is to set forth only those facts necessary  
to establish probable cause to arrest, I have not described all the relevant facts and  
circumstances of which I am aware.


1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI") and have been involved in the investigation of numerous cases involving narcotics smuggling and distribution. I am familiar with the facts and circumstances set forth below from personal knowledge, from my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

1. On or about July 3, 2018, the defendant TERRENCE HOHENKIRK arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard Caribbean Airlines flight number BW 526 from Georgetown, Guyana.

2. Upon his arrival, the defendant TERRENCE HOHENKIRK was selected for an enforcement examination by United States Customs and Border Protection ("CBP") officers. A CBP officer conducted a search of the defendant's suitcase and backpack, which was negative. The defendant was presented with an x-ray consent form, which he read, appeared to understand and signed. A CBP officer told the defendant that he was suspected of bringing narcotics into the United States inside his body. The defendant then admitted that he did have narcotics inside his body. An x-ray examination of the defendant was conducted and revealed the presence of foreign bodies.

3. Commencing on or about July 4, 2018, and finishing on or about July 10, 2018, the defendant TERRENCE HOHENKIRK passed approximately 148 pellets with a total gross weight of approximately 1,743.5 grams of cocaine. One of the pellets was probed and found to contain a substance that field-tested positive for cocaine.

WHEREFORE, your deponent respectfully requests that the defendant  
TERRENCE HOHENKIRK be dealt with according to law.

  
RENEE TUINSTRA  
Special Agent  
U.S. Department of Homeland Security,  
Homeland Security Investigations

Sworn to before me this  
11th day of July, 2018

  
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THE HONORABLE  
UNITED STATES  
EASTERN DISTRICT OF

